

**D. The Commission Should Adopt  
Substantial Application Filing Fees and  
Forfeiture Bonds in Order to Deter Speculation**

23. A considerable portion of the PacTel Comments is devoted to developing a creative application fee structure which would serve the dual purpose of deterring insincere applicants while satisfying the Commission's statutory obligations with respect to fees. PacTel Comments at Section III.C. and Attachment 3.<sup>37/</sup> PacTel recommended that this up-front filing fee mechanism be coupled with a forfeiture bond requirement that will ensure the seriousness of the capabilities and intentions of those seeking PCS licenses. PacTel Comments, Section IV.D.

24. Although few others of the Commenting Parties went into as much detail as PacTel on requirements of this nature, there were several comments filed which generally support the PacTel approach. For example, Arch urged the adoption of an up-front application fee that is sufficiently high to discourage speculation. Arch specifically suggested a two-tiered fee structure in which an initial fee related to conducting the lottery is charged, and a further fee related to the processing of the application is charged, with the latter being collected only from the lottery winner. Like PacTel, Arch is of the view

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<sup>37/</sup> A substantial non-refundable up-front application fee geared to the costs of processing all applications through the lottery would be required under PacTel's proposal. In addition, a refundable fee geared to the costs of processing the winning application would be submitted.

that this would eliminate potential challenges based upon the claim that the Commission cannot charge substantial per-transmitter fees for applications that are not, in fact, processed. See Arch Comments at pp. 12-13.

25. Dial Page, Telocator and In-Flight also recommended that substantial application fees be adopted as a method of deterring speculation. See Telocator Comments at p. 14, In-Flight Comments at p. 3 and Dial Page Comments at pp. 8-9. And, Florida Cellular echoes PacTel's concern that fees must approximate the costs of application processing in order to be sustainable. See Florida Cellular Comments at p. 13.<sup>38/</sup>

26. PacTel's forfeiture bond approach also finds support in the NABER Comments. NABER suggests that the Commission "require a licensee to post a performance bond to guarantee timely construction and operation of the authorized system". NABER Comments at p. 9. PacTel's only suggestion with respect to the NABER proposal would be that the performance bond be included as an initial application requirement in order to deter speculation at the initial filing stage.

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<sup>38/</sup> See also UTC Comments at pp. 35-36 (proposing "reasonably high" fees).

**E. Narrowband PCS Authorizations  
Should Be Freely Transferable**

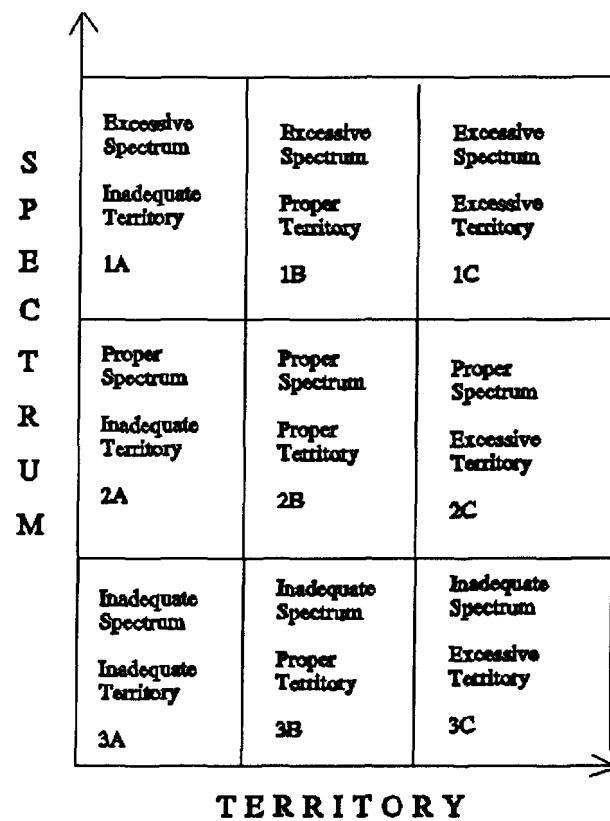
27. Although PacTel strongly favors the adoption of strict anti-speculation measures, it expressed the view that restrictions on transfer would not be an effective deterrent, and could unjustifiably encumber the ability of *bona fide* licensees to acquire the spectrum needed to implement beneficial public services. See PacTel Comments at pp. 53-54. Other knowledgeable participants share PacTel's concern. For example, Telocator properly notes that restrictions on transfer have been ineffective in the past in deterring speculation. In the meantime, they have the deleterious effect of creating barriers to the transfer of authorizations to qualified service providers who are interested in expanding their operations. Telocator Comments at p. 15. Similarly, Freeman supports the free transferability of spectrum, in particular recognizing the possible need to aggregate channels or territories in order to provide a desired service. Freeman Comments at n.7.

**III. CONCLUSION**

28. In summary, the comments on the narrowband PCS allocation demonstrate the substantial public interest in proceeding expeditiously with this allocation. By reviewing the subject comments, the Commission will discern common themes and

consensus positions which, if given due consideration, will result in a flexible allocation and encourage diverse services offered on a competitive basis to the benefit of the public.

29. The challenge facing the Commission in optimizing the narrowband PCS allocation is to ensure that *bona fide* applicants are granted an adequate (but not excessive) amount of spectrum over an appropriate geographic area. The difficulty of this task is depicted by the following diagram of possible results:



Only one of the nine pairings on this grid represents an efficient allocation (Grid Section 2B).<sup>39/</sup> All other pairings are less than optimal.

30. The worst pairings are those in the four corners of the grid (Grid Sections 1A, 1C, 3A and 3C) in which neither the bandwidth nor the territory are appropriate. This suggests that the Commission would be well-advised to adopt a moderate course which eschews bandwidths that are too small (25 kHz) or too large (200 kHz) and regions that are too small (i.e., MSAs) or too large (i.e., nationwide).

31. PacTel Paging has offered a comprehensive narrowband PCS licensing plan that strikes an appropriate balance between variant bandwidth and service territory proposals. This

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<sup>39/</sup> In fact, the task is even more daunting than this grid suggests. An efficient pairing of bandwidth and service area could be completely undermined by a licensing mechanism that fails to weed out insincere applicants and thus results in a grant to a speculator with no intention or ability to provide a beneficial public service.

plan, coupled with the strict anti-speculation devices crafted by PacTel, will serve the public interest.

Respectfully submitted,

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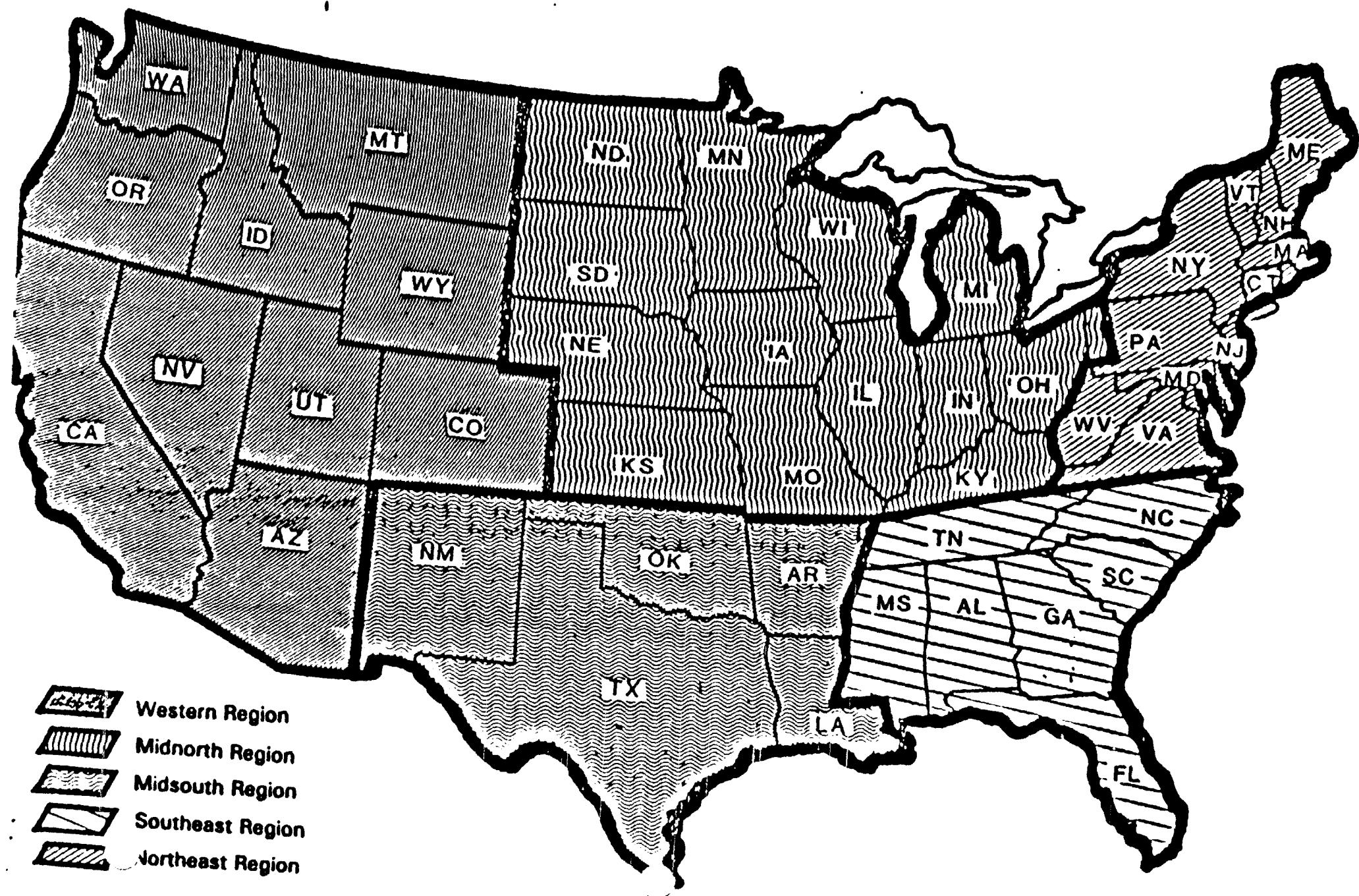
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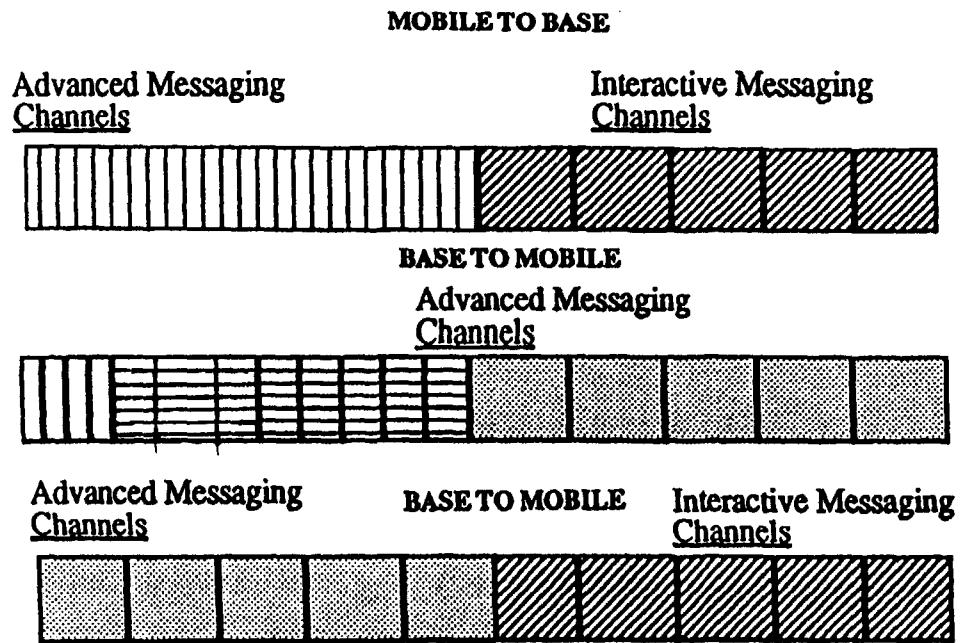
**ATTACHMENT 1**

ATTACHMENT 1



**ATTACHMENT 2**

## **Proposed Channel Scheme Narrow Band PCS Spectrum**



**901-902 MHz.**

**25, 20 KHz Advanced Messaging Channels** paired with base-to-mobile Advanced Messaging Channels. (Unused channels to be available to current one-way licensees.)

**5, 100 KHz Interactive Messaging Channels** paired with base-to-mobile Interactive Messaging Channels.

**930-931 MHz.**

**5, 100 KHz Advanced Messaging Channels**  
**8, 50 KHz Advanced Messaging Channels**  
**4, 25 KHz Advanced Messaging Channels**

**940-941 MHz.**

**5, 100 KHz Advanced Messaging Channels**  
**5, 100 KHz Interactive Messaging Channels**

CERTIFICATE OF SERVICE

I, Tana C. Maples, a secretary in the law firm of Bryan Cave, do hereby certify that on this 8th day of January, 1993 copies of the foregoing **Reply Comments of PacTel Paging** were mailed, postage prepaid, or hand delivered where indicated, courier charges prepaid, to the following:

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